

SEALED

FILED

OCT 05 2021

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

Mark C. McCartt, Clerk
U.S. DISTRICT COURT

UNITED STATES OF AMERICA,

Plaintiff,

v.

KEITH DUANE PARNELL,

Defendant.

Case No. **21CR439CVE**

FILED UNDER SEAL

INDICTMENT

[COUNT ONE: 18 U.S.C. §§ 1151, 1153, 2241(c), and 2246(2)(B) – Aggravated Sexual Abuse of a Minor Under 12 in Indian Country;
COUNTS TWO and SIX: 18 U.S.C. §§ 1151, 1153, 2241(c), and 2246(2)(D) – Aggravated Sexual Abuse of a Minor Under 12 in Indian Country;
COUNTS THREE and TEN: 18 U.S.C. §§ 1151, 1153, 2243(a), and 2246(2)(A) – Sexual Abuse of a Minor in Indian Country;
COUNT FOUR: 18 U.S.C. §§ 1151, 1153, 2243(a), and 2246(2)(D) – Sexual Abuse of a Minor in Indian Country;
COUNT FIVE: 18 U.S.C. §§ 1151, 1153, 2243(a), and 2246(3) – Sexual Abuse of a Minor in Indian Country;
COUNT SEVEN: 18 U.S.C. §§ 1151, 1153, 2241(c), and 2246(2)(C) – Aggravated Sexual Abuse of a Minor Under 12 in Indian Country;
COUNT EIGHT: 18 U.S.C. §§ 1151, 1153, 2243(a), and 2246(2)(C) – Sexual Abuse of a Minor in Indian Country;
COUNT NINE: 18 U.S.C. §§ 1151, 1153, 2243(a), and 2246(2)(B) – Sexual Abuse of a Minor in Indian Country]

THE GRAND JURY CHARGES:

COUNT ONE

[18 U.S.C. §§ 1151, 1153, 2241(c), and 2246(2)(B)]

From in or about 1998 to in or about 2004, within Indian County in Northern District of Oklahoma, the defendant, **KEITH DUANE PARNELL**, an Indian, did knowingly engage in a sexual act with M.V.1, a child known to the Grand Jury, who had not attained the age of 12 years, by intentionally placing his genitals in M.V.1's mouth.

All in violation of Title 18, United States Code, Section 1151, 1153, 2241(c), and 2246(2)(B).

COUNT TWO
[18 U.S.C. §§ 1151, 1153, 2241(c), and 2246(2)(D)]

From in or about 2003 and through in or about 2004, within Indian County in Northern District of Oklahoma, the defendant, **KEITH DUANE PARNELL**, an Indian, did knowingly engage in a sexual act with M.V.1, a child known to the Grand Jury who had not attained the age of 12 years, by intentionally touching M.V.1's naked genitalia and vulva.

All in violation of Title 18, United States Code, Section 1151, 1153, 2241(c), and 2246(2)(D).

COUNT THREE

[18 U.S.C. §§ 1151, 1153, 2243(a), and 2246(2)(A)]

From in or about 2005 through in or about 2006, within Indian Country in the Northern District of Oklahoma, the defendant, **KEITH DUANE PARNELL**, an Indian, did knowingly engage in a sexual act with M.V.1, a child known to the Grand Jury who had attained the age of 12 years, but had not attained the age of 16 years, and was at least four years younger than **PARNELL**, by penetrating M.V.1's vulva with his penis.

All in violation of Title 18, United States Code, Section 1151, 1153, 2243(a), and 2246(2)(A).

COUNT FOUR
[18 U.S.C. §§ 1151, 1153, 2243(a), and 2246(2)(D)]

From in or about 2005 through in or about 2006, within Indian Country in the Northern District of Oklahoma, the defendant, **KEITH DUANE PARNELL**, an Indian, did knowingly engage in a sexual act with M.V.1, a child known to the Grand Jury who had attained the age of 12 years, but had not attained the age of 16 years, and was at least four years younger than **PARNELL**, by intentionally touching M.V.1's naked genitalia with an intent to abuse, humiliate, harass, degrade, and arouse and gratify the sexual desire of any person.

All in violation of Title 18, United States Code, Section 1151, 1153, 2243(a), and 2246(2)(D).

COUNT FIVE
[18 U.S.C. §§ 1151, 1153, 2243(a), and 2246(3)]

In or about 2007, within Indian Country in the Northern District of Oklahoma, the defendant, **KEITH DUANE PARNELL**, an Indian, did knowingly engage in a sexual act with M.V.1, a child known to the Grand Jury who had attained the age of 12 years, but had not attained the age of 16 years, and was at least four years younger than **PARNELL**, by intentionally touching M.V.1's breast, both over and under clothing, with an intent to abuse, humiliate, harass, degrade, and arouse and gratify the sexual desire of any person.

All in violation of Title 18, United States Code, Section 1151, 1153, 2243(a), and 2246(3).

COUNT SIX
[18 U.S.C. §§ 1151, 1153, 2241(c), and 2246(2)(D)]

From in or about 1993 to on or about January 27, 2005, within Indian Country in the Northern District of Oklahoma, the defendant, **KEITH DUANE PARNELL**, an Indian, did knowingly engage in a sexual act with M.V.2, a child known to the Grand Jury who had not attained the age of 12 years, by intentionally touching M.V.2's naked genitalia with an intent to abuse, humiliate, harass, degrade, and arouse and gratify the sexual desire of any person.

All in violation of Title 18, United States Code, Section 1151, 1153, 2241(c), and 2246(2)(D).

COUNT SEVEN
[18 U.S.C. §§ 1151, 1153, 2241(c), and 2246(2)(C)]

From in or about 1993 to on or about January 27, 2005, within Indian Country in the Northern District of Oklahoma, the defendant, **KEITH DUANE PARNELL**, an Indian, did knowingly engage in a sexual act with M.V.2, a child known to the Grand Jury who had attained the age of 12 years, but had not attained the age of 16 years, and was at least four years younger than **PARNELL**, by intentionally penetrating M.V.2's genital opening with a hand, finger, and any object with an intent to abuse, humiliate, harass, degrade, and arouse and gratify the sexual desire of any person.

All in violation of Title 18, United States Code, Section 1151, 1153, 2241(c), and 2246(2)(C).

COUNT EIGHT
[18 U.S.C. §§ 1151, 1153, 2243(a), 2246(2)(C)]

From in or about 2005 through in or about 2007, within Indian Country in the Northern District of Oklahoma, the defendant, **KEITH DUANE PARNELL**, an Indian, did knowingly engage in a sexual act with M.V.2, a child known to the Grand Jury who had attained the age of 12 years, but had not attained the age of 16 years, and was at least four years younger than **PARNELL**, by intentionally penetrating M.V.2's genital opening with a hand, finger, and any object with an intent to abuse, humiliate, harass, degrade, and arouse and gratify the sexual desire of any person.

All in violation of Title 18, United States Code, Section 1151, 1153, 2243(a), and 2246(2)(C).

COUNT NINE
[18 U.S.C. §§ 1151, 1153, 2243(a), and 2246(2)(B)]

From in or about 2005 through in or about 2007, within Indian Country in the Northern District of Oklahoma, the defendant, **KEITH DUANE PARNELL**, an Indian, did knowingly engage in a sexual act with M.V.2, a child known to the Grand Jury who had attained the age of 12 years, but had not attained the age of 16 years, and was at least four years younger than **PARNELL**, by intentionally placing his mouth on M.V.2's vulva.

All in violation of Title 18, United States Code, Section 1151, 1153, 2243(a), and 2246(2)(B).

COUNT TEN
[18 U.S.C. §§ 1151, 1153, 2243(a), and 2246(2)(A)]

On or between 2005 and 2007, within Indian Country in the Northern District of Oklahoma, the Defendant, **KEITH DUANE PARNELL**, an Indian, did knowingly engage in a sexual act with M.V.2, an Indian child known to the Grand Jury who had attained the age of twelve years, but had not attained the age of sixteen years, and was at least four years younger than **PARNELL**, by intentionally penetrating M.V.2's vulva and anus with his penis.

All in violation of Title 18, United States Code, Section 1151, 1153, 2243(a), and 2246(2)(A).

CLINTON J. JOHNSON
Acting United States Attorney

A TRUE BILL



NIKO BOULIERIS
Assistant United States Attorney

/s/ Grand Jury Foreperson
Grand Jury Foreperson